

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Postal Rate and Fee Changes, 2000

Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE
WITNESS RAYMOND TO ADVO INTERROGATORY
(ADVO/USPS-T13-149)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatory of Advo, Inc.: ADVO/USPS-T13-149, filed on April 26, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking


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May 26, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND
TO ADVO, INC. FOLLOW-UP INTERROGATORIES**

ADVO/USPS-T13-149. ADVO interrogatory ADVO/USPS-T13-17 asked for the number of possible deliveries by delivery type for each route code in your database.

- (a) Please confirm that your response includes information for only 297 of the total 340 routes in your database.**
- (b) Please provide, in the form of an amended response to interrogatory 17, the requested information for all 340 routes in your database. If available, please provide the information in electronic as well as hard copy format.**
- (c) If information for the missing 43 routes is unavailable, please state the source of the information for the 297 routes that were provided, and explain why the information is not available for the other routes.**

RESPONSE:

- (a) Confirmed. ADVO/USPS-T13-17 has 297 rows of data. This was the only data available electronically at the time.**
- (b) By using the information verified in preparing ADVO/USPS-T13-61, I am able to provide the following Excel spreadsheet named ADVO149(b) as LR-I-389.**
- (c) In most cases the additional information on the missing 43 routes came from the USPS form 3999X collected by the observers. In some cases the additional information on the missing 43 routes came from the observer comment sheet.**

RouteNumberCode	UnitCode	Residential Other	Residential Curb	Residential NDCBU	Residential Central	Business Other	Business Curb	Business NDCBU	Business Central
0101	CY49	204	150	103	68	253	7	0	0
0101	CY66	133	1	134	68	121	0	12	48
0102	CY49	81	6	0	24	313	91	0	1
0102	CY66	324	7	55	112	51	0	5	0
0103	CY66	43	0	0	0	325	0	0	10
0104	CY66	51	2	9	90	182	0	0	5
0105	CY48	145	0	0	0	175	0	9	0
0105	CY66	202	15	174	46	91	0	73	27
0106	CY66	291	53	166	68	54	0	14	4
0107	CY66	138	126	80	22	115	3	12	33
0108	CY66	172	25	13	36	104	1	27	0
0110	CY66	308	23	159	154	17	0	0	0
0111	CY66	15	399	259	4	8	10	90	0
0112	CY66	378	94	161	9	8	0	0	0
0113	CY66	211	88	321	0	42	6	2	0
0114	CY66	8	307	236	0	53	21	24	0
0115	CY66	15	419	98	0	13	26	18	0
0116	CY66	280	221	31	0	3	0	0	0
0117	CY66	137	377	135	0	1	0	0	0
0119	CY66	220	165	118	0	16	0	19	4
0120	CY66	482	35	27	0	12	2	0	0
0123	CY66	288	133	102	28	42	1	1	2
0124	CY66	14	221	377	0	11	25	44	0
0126	CY66	293	104	157	18	1	1	0	0
0128	CY66	240	155	241	0	112	14	25	0
0129	CY66	208	6	256	0	1	0	0	0
0130	CY66	99	17	364	0	0	0	0	0
0131	CY66	0	0	318	0	0	0	0	0
0134	CY37	398	0	0	15	42	0	0	0
0146	CY48	367	23	0	0	3	0	0	0
0164	CY48	0	130	476	0	57	5	0	0
0211	CY37	212	10	35	0	48	27	1	66
0240	CY66	28	29	82	0	200	8	75	17
0241	CY66	24	216	322	139	88	8	13	4
0242	CY66	127	163	59	0	66	0	13	49
0243	CY66	1	182	22	102	146	9	8	21
0244	CY66	84	424	147	40	19	9	69	8
0245	CY66	323	96	225	4	0	2	0	0
0246	CY66	0	350	225	0	16	1	0	10
0247	CY66	56	355	276	146	9	7	21	0
0248	CY66	33	345	373	0	3	6	3	0
0249	CY66	147	156	312	0	3	0	0	0
0250	CY66	47	34	154	4	176	3	24	5
0251	CY66	115	159	342	0	68	6	10	11
0252	CY66	169	170	264	0	10	23	38	0
0253	CY66	226	72	212	147	87	5	54	0
0254	CY66	165	150	367	0	1	0	0	0
0255	CY66	24	0	620	0	8	0	0	0
0256	CY66	458	0	187	0	1	0	0	0
0257	CY66	73	51	488	8	73	14	16	0
0281	CY66	54	164	213	0	59	70	146	0
0305	CY59	173	0	0	110	79	0	0	5
0310	CY36	417	0	0	101	27	0	0	0
0320	CY59	355	0	12	240	21	0	0	0
0321	CY37	521	1	0	0	10	0	0	0
0326	CY36	195	0	0	0	45	0	0	8
0337	CY48	0	387	0	0	1	1	0	0

0370	CY66	1	327	401	0	1	5	1	0
0371	CY66	19	12	757	143	13	5	9	0
0372	CY66	270	119	346	26	26	5	11	0
0373	CY66	6	404	452	0	8	30	27	0
0374	CY66	199	0	415	124	0	0	0	0
0375	CY66	1	346	440	0	27	8	23	0
0376	CY66	65	98	35	307	44	1	0	0
0377	CY66	29	107	712	67	14	9	16	0
0378	CY66	157	131	326	148	6	2	10	0
0379	CY66	20	8	668	0	110	4	44	0
0380	CY66	91	293	505	8	6	2	0	0
0382	CY66	314	54	251	0	1	0	0	0
0383	CY66	53	21	671	50	68	1	32	0
0384	CY66	5	26	769	0	4	1	21	0
0405	CY56	220	3	168	95	44	4	1	1
0406	CY62	129	0	0	0	155	2	0	0
0411	CY54	351	33	0	0	48	0	0	0
0415	CY62	470	0	0	0	44	0	0	0
0424	CY54	38	533	0	0	9	1	0	0
0424	CY62	363	1	68	513	24	1	0	0
0426	CY62	178	7	15	152	168	3	0	0
0432	CY54	585	38	0	0	16	0	0	0
0467	CY56	0	328	315	112	0	1	1	1
0474	CY54	175	50	40	302	51	12	0	1
0480	CY36	575	6	0	0	3	0	0	0
0498	CY56	0	73	115	457	55	65	40	0
0603	CY23	276	0	0	25	2	0	0	0
0607	CY23	218	0	0	0	0	0	0	0
0610	CY41	0	0	0	0	193	0	0	0
0611	CY55	328	0	0	0	10	0	0	0
0621	CY55	364	0	0	0	0	0	0	0
0623	CY23	261	4	0	2	12	0	0	0
0626	CY41	0	0	0	0	39	0	0	0
0628	CY41	0	0	0	0	246	0	0	0
0711	CY49	216	68	0	42	0	0	0	0
0716	CY49	0	345	299	0	2	5	1	0
0801	CY63	193	1	0	0	6	0	0	0
0802	CY63	251	0	0	0	1	0	0	0
0803	CY63	192	1	0	0	2	0	0	0
0806	CY63	413	0	33	12	1	0	0	0
0807	CY63	174	172	0	0	1	0	0	0
0808	CY63	342	6	0	0	0	0	0	0
0809	CY63	311	0	0	0	0	0	0	0
0811	CY63	103	47	0	0	204	0	0	0
0815	CY63	367	1	0	0	0	0	0	0
0816	CY63	208	1	0	0	0	0	0	0
0817	CY63	283	0	0	0	1	0	0	0
0818	CY26	131	0	0	743	41	0	0	0
0819	CY63	267	10	1	0	53	1	0	0
0820	CY63	249	66	0	0	0	0	0	0
0821	CY63	145	24	0	0	106	0	0	0
0822	CY63	46	250	0	0	0	0	0	0
0823	CY63	190	32	0	285	10	1	0	21
0824	CY63	242	140	0	0	1	0	0	0
0825	CY63	8	269	0	0	1	0	0	0
0827	CY63	75	77	0	0	153	10	0	0
0828	CY26	513	0	0	115	40	0	0	2
0828	CY63	168	95	0	0	0	0	0	0
0830	CY63	163	161	84	0	51	0	0	0

0831	CY63	0	255	198	0	9	0	1	0
0832	CY63	150	0	0	66	109	0	20	33
0849	CY26	391	0	0	49	25	0	0	0
0908	CY39	0	152	272	177	24	0	0	8
1024	CY15	269	124	155	83	29	3	0	0
1049	CY56	2	528	107	163	7	55	18	2
1061	CY15	340	22	0	234	17	5	0	1
1101	CY52	40	0	20	714	35	0	0	6
1111	CY52	132	0	0	120	145	0	0	49
1121	CY52	140	145	0	0	1	0	0	0
1131	CY52	7	324	0	0	0	0	0	0
1132	CY46	69	344	18	195	4	4	0	0
1133	CY46	18	369	23	191	0	0	0	1
1142	CY46	0	415	56	0	1	0	0	0
1145	CY46	161	255	51	35	0	0	0	0
1148	CY46	0	342	146	0	2	1	0	0
1205	CY39	103	285	31	0	2	0	0	0
1206	CY39	0	72	370	386	2	0	0	0
1233	CY16	0	632	34	31	0	2	0	0
1237	CY16	0	486	15	48	51	21	0	0
1252	CY16	72	322	0	96	59	8	0	0
1401	CY64	407	4	0	0	5	1	0	0
1411	CY47	372	75	0	0	0	0	0	0
1428	CY27	353	0	60	0	14	0	0	0
1430	CY27	184	1	0	0	56	1	0	0
1435	CY27	271	0	0	36	15	0	0	0
1457	CY64	168	53	32	79	86	0	0	0
1475	CY47	0	0	348	288	79	1	0	132
1507	CY47	71	184	354	0	16	0	0	8
1508	CY47	343	1	220	140	3	0	0	0
1558	CY02	429	0	0	95	28	0	0	0
1560	CY02	211	8	0	0	2	0	0	0
1569	CY02	199	15	0	0	1	0	0	0
1579	CY02	275	50	0	195	45	1	15	0
1581	CY02	118	122	0	33	2	0	0	0
1586	CY47	224	0	301	0	0	0	0	0
1595	CY02	352	0	0	142	0	0	0	0
1605	CY55	1	18	0	0	145	4	14	172
1606	CY55	53	0	95	227	115	0	0	26
1612	CY33	185	41	0	0	8	0	0	0
1618	CY33	162	144	0	0	0	0	0	0
1620	CY08	26	409	0	0	0	0	0	0
1632	CY08	31	569	0	0	11	3	0	26
1638	CY08	217	3	0	37	0	0	0	0
1842	CY33	225	290	0	0	3	1	0	0
1901	CY60	96	394	4	0	93	15	18	0
1908	CY17	0	259	0	0	34	2	0	0
1913	CY60	561	2	0	0	17	0	0	0
1917	CY60	0	48	282	337	118	61	82	0
1926	CY17	239	66	0	0	25	0	0	0
1928	CY17	284	0	0	0	0	0	0	0
1929	CY60	253	348	0	0	11	3	0	0
1946	CY42	0	0	0	1151	31	0	0	0
2155	CY10	2	257	14	0	4	23	6	1
2160	CY10	1	0	196	268	34	2	5	0
2167	CY10	7	281	83	0	5	4	7	19
2169	CY10	0	0	92	561	72	0	0	0
2201	CY53	362	0	0	0	24	0	0	14
2202	CY53	182	0	0	243	2	0	0	0

2203	CY53	333	0	0	116	0	0	0	0
2205	CY53	181	0	0	178	6	0	0	0
2206	CY53	315	0	0	109	3	0	0	0
2207	CY53	360	0	0	16	14	0	0	4
2210	CY53	189	0	0	271	34	0	0	0
2211	CY53	361	0	0	104	24	0	0	0
2212	CY53	291	0	0	43	0	0	0	0
2213	CY53	213	0	0	216	22	0	0	0
2214	CY53	182	0	0	393	28	0	0	0
2215	CY53	161	0	0	371	0	0	0	0
2216	CY53	369	0	0	107	0	0	0	0
2219	CY53	301	0	0	51	54	0	0	0
2221	CY53	269	0	0	95	85	0	0	0
2224	CY53	331	0	0	12	13	0	0	0
2225	CY53	347	0	0	22	1	0	0	0
2227	CY53	387	0	0	46	0	0	0	0
2374	CY28	0	24	40	513	26	47	14	0
2375	CY28	24	329	0	0	53	9	0	0
2385	CY28	209	166	0	203	8	0	22	0
2402	CY59	33	0	0	520	3	0	0	0
2407	CY64	1	243	8	16	51	1	0	0
2411	CY64	0	268	0	0	5	1	0	0
2417	CY59	130	0	0	313	2	0	0	0
2451	CY09	3	0	0	733	133	2	0	2
2465	CY09	90	0	336	447	18	0	0	0
2469	CY09	4	351	0	0	0	0	0	0
2717	CY61	0	383	167	70	13	1	0	0
2806	CY05	340	0	0	0	118	0	0	0
2814	CY05	0	466	0	0	1	0	0	0
2822	CY05	374	0	0	0	0	0	0	0
2835	CY05	0	0	172	901	49	2	0	0
2912	CY18	470	0	0	0	6	0	0	0
2934	CY18	499	0	0	0	22	0	0	0
2947	CY18	487	0	0	0	19	0	0	0
3104	CY34	881	0	1	3	209	0	0	0
3125	CY34	719	0	0	0	17	0	0	0
3141	CY34	604	0	54	50	7	0	0	0
3549	CY29	339	0	0	0	8	4	0	0
3618	CY29	0	432	0	0	0	0	0	0
3655	CY30	76	114	139	52	4	17	21	0
3656	CY29	1	392	69	104	1	3	1	0
3703	CY14	465	2	0	128	22	0	0	1
3704	CY57	327	0	0	84	3	0	0	0
3705	CY14	453	1	0	134	35	0	0	1
3706	CY14	520	3	0	67	23	0	0	0
3707	CY14	542	13	0	67	18	2	0	0
3707	CY57	320	22	0	0	1	0	0	0
3709	CY57	49	0	0	467	33	0	0	0
3716	CY57	106	0	0	434	3	0	0	0
4104	CY03	358	1	0	153	12	0	7	0
4106	CY03	198	166	0	0	4	31	0	0
4111	CY03	35	165	328	0	0	0	1	0
4114	CY03	215	190	0	0	0	0	0	0
4126	CY03	273	18	0	0	50	10	0	0
4207	CY04	0	215	0	0	26	0	0	2
4211	CY04	148	0	0	49	40	0	14	0
4213	CY04	72	0	0	0	75	0	0	13
4214	CY04	1	82	0	0	51	0	0	56
4218	CY04	0	93	0	0	615	2	0	0

4219	CY04	112	176	0	0	0	0	0	0
4221	CY04	97	239	0	0	0	0	0	0
4222	CY04	203	65	0	0	1	3	0	0
4224	CY04	149	10	0	33	112	2	0	0
4225	CY04	2	361	4	0	0	3	0	0
4228	CY04	0	236	0	0	49	0	3	11
4229	CY04	0	277	0	155	4	1	0	0
4230	CY04	42	0	0	50	136	0	47	10
4232	CY04	1	290	0	0	45	3	36	0
4233	CY04	383	0	0	0	34	0	8	0
4234	CY04	0	331	67	0	0	0	0	0
4235	CY04	90	38	0	0	69	1	0	0
4236	CY04	0	142	20	0	98	1	0	0
4237	CY04	177	0	0	30	91	0	0	0
4238	CY04	0	141	0	0	25	1	0	64
4241	CY04	0	111	86	0	68	2	0	26
4242	CY04	0	148	0	84	93	0	0	1
4243	CY04	0	254	0	56	0	62	0	0
4248	CY04	117	0	99	108	45	2	0	14
4249	CY04	0	202	15	16	13	4	0	0
4254	CY04	75	301	0	0	2	0	0	0
4257	CY04	51	159	0	0	50	16	9	0
4258	CY04	152	0	0	242	26	1	0	1
4259	CY04	176	0	0	0	60	0	0	0
4262	CY04	0	191	0	0	14	10	20	46
4265	CY04	163	48	0	0	65	0	14	0
4271	CY61	0	634	0	157	7	0	0	0
4272	CY04	138	0	0	0	0	0	0	0
4273	CY61	0	728	161	0	2	4	0	0
4275	CY61	0	687	0	0	4	0	0	0
4285	CY04	142	7	122	146	1	0	0	0
4310	CY29	344	0	0	36	74	2	0	4
4442	CY30	0	424	148	0	0	0	0	0
4506	CY29	0	459	0	0	0	0	0	0
4515	CY29	60	328	24	0	5	43	0	0
4708	CY11	346	0	8	223	46	0	0	0
4712	CY11	424	0	100	88	14	0	22	0
4719	CY11	442	0	0	43	1	0	0	0
4725	CY11	377	0	27	316	5	0	0	5
4726	CY11	465	2	0	128	22	0	0	1
4731	CY11	291	0	24	241	0	0	0	0
4732	CY11	244	0	7	255	90	0	6	49
4811	CY11	100	0	0	0	0	266	4	0
4814	CY11	213	0	0	189	79	0	31	11
4817	CY11	296	0	0	0	72	0	0	19
4846	CY19	67	84	209	0	1	0	0	0
4880	CY19	104	94	0	162	13	1	0	0
4906	CY04	0	287	15	0	5	0	17	0
4908	CY04	0	80	0	0	78	7	0	0
4909	CY04	205	3	0	415	4	2	0	0
4910	CY04	0	106	64	0	23	1	1	66
4910	CY11	179	0	211	108	63	0	8	0
4912	CY04	69	3	125	261	9	0	28	0
4915	CY04	0	316	0	0	64	11	0	0
4916	CY04	0	285	11	0	3	0	0	0
4917	CY04	0	440	0	0	25	1	0	0
4920	CY04	0	268	30	154	1	0	0	0
4921	CY11	320	0	101	226	0	0	0	0
4926	CY04	0	639	19	0	3	2	0	0

4931	CY04	10	105	32	286	1	0	0	0
4940	CY04	0	516	0	0	0	0	0	0
4944	CY04	0	2	357	210	58	9	55	0
4945	CY04	0	25	263	0	55	11	47	0
4999	CY04	153	0	0	0	0	0	0	0
5546	CY20	386	69	0	0	11	0	0	0
5566	CY20	0	455	0	0	1	0	0	0
6156	CY51	33	417	0	0	0	0	0	0
6157	CY51	9	449	0	0	0	0	0	0
6410	CY51	478	1	0	26	73	0	1	0
6419	CY51	517	5	0	6	4	0	0	0
6703	CY35	227	331	0	0	0	0	0	0
6739	CY35	0	526	0	0	2	2	0	0
6742	CY35	0	357	0	0	1	2	0	0
8008	CY38	162	162	9	0	3	1	0	0
8028	CY07	95	0	0	284	149	0	0	19
8035	CY07	49	396	0	0	0	0	0	0
8044	CY38	0	308	0	31	1	25	30	1
8045	CY07	56	42	0	241	52	0	0	48
8212	CY58	201	0	0	6	0	0	0	0
8217	CY58	184	0	0	20	0	0	0	0
8218	CY58	4	0	0	573	0	0	0	0
8221	CY58	147	14	0	0	0	8	0	0
8229	CY38	175	163	0	0	2	1	0	0
8404	CY40	180	0	0	200	130	1	0	1
8405	CY40	477	0	0	0	3	0	0	0
8408	CY40	278	55	0	0	25	24	16	0
8701	CY50	0	189	0	0	5	5	91	34
8702	CY50	2	572	0	0	2	1	11	0
8703	CY50	0	596	100	0	0	5	0	0
8705	CY50	0	308	0	0	44	7	18	0
8711	CY50	0	386	0	0	3	5	0	0
8714	CY50	0	459	0	0	0	0	0	0
8717	CY50	1	573	0	0	1	4	0	0
8726	CY50	1	573	0	0	0	1	0	0
8727	CY50	0	388	0	0	1	2	0	0
8729	CY50	2	540	0	0	0	0	0	0
8735	CY50	0	380	0	0	19	17	0	24
8736	CY50	1	558	0	0	1	0	0	0
8739	CY50	1	135	358	268	2	3	1	0
8744	CY50	0	351	0	0	0	0	0	0
8747	CY50	0	547	0	0	18	2	0	0
8748	CY50	0	483	0	0	0	0	0	0
8756	CY50		691	0	0	3	6	0	0
8759	CY50	1	135	358	268	2	3	1	0
8770	CY50	0	462	0	0	0	4	0	0
9302	CY06	0	369	0	0	0	2	0	0

DECLARATION

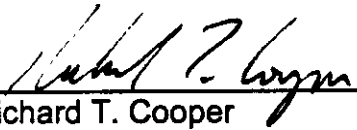
I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 5-26-00

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Richard T. Cooper

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
May 26, 2000